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September 18, 2012

Mr. Steven L. Renninger
On-Scene Coordinator
Emergency Response Branch
U.S. Environmental Protection Agency, Region V
26 West Martin Luther King Drive
Cincinnati, OH 45268

**Subject: Final Letter Report
Multi-Service Site – Removal Action
Dayton, Montgomery County, Ohio
Technical Direction Document No.: S05-0001-1102-017
Document Control No.: 1386-2A-BAPA
Contract No.: EP-S5-06-04**

Dear Mr. Renninger:

The Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team (START) prepared this letter report in accordance with the requirements of Technical Direction Document (TDD) No. S05-0001-1102-017, which the United States Environmental Protection Agency (U.S. EPA) assigned to WESTON START. The scope of this TDD was to support and oversee a time-critical removal action at the Multi-Service Site located at 1962 Radio Road in Dayton, Montgomery County, Ohio (the Site). The Site is a former industrial dry-cleaning and laundry facility. The removal action involved the off-site disposal of approximately 14,925 gallons of flammable liquid; 3 rolloff boxes of flammable solvent-soaked rags and shop towels; 4,227 gallons of decontamination liquid; 13 rolloff boxes of flammable sludge; and 15 rolloff boxes of nonhazardous debris. During the removal action, 164.37 tons of scrap metal, 970 pounds of scrap copper, and 6 pallets of electronic waste were recycled. **Table 1 in Attachment A** summarizes the wastes disposed of and the disposal facilities. On February 25, 2011, the U.S. EPA Superfund Division Director signed an action memorandum approving funding for a time-critical removal action at the Site. WESTON START mobilized to the Site on May 3 and demobilized from the Site on August 22, 2011.

The Site's geographical coordinates are 39° 46' 18.336" North latitude and 84° 7' 45.984" West longitude (**Figure 1 in Attachment B**). To complete the TDD, WESTON START performed the following activities:

- Reviewed a site-specific safety plan prepared by the Emergency and Rapid Response Services (ERRS) contractor
- Prepared an emergency contingency plan



Mr. Steven Renninger
U.S. EPA, Region V

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Multi-Service Site
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- Conducted hazard categorization (HAZCAT) activities on the contents of approximately 109 tanks, 55-gallon drums, and numerous small containers
- Entered and managed all HAZCAT information into the U.S. EPA DrumTrak database program
- Prepared waste disposal samples
- Conducted bench-scale testing of on-site waste streams
- Conducted air monitoring using an AreaRAE air sampling network
- Oversaw the removal and disposal of 14,925 gallons of flammable liquid; 3 rolloff boxes of flammable solvent-soaked rags and shop towels; 4,227 gallons of decontamination liquid; 13 rolloff boxes of flammable sludge; and 15 rolloff boxes of non-hazardous debris
- Oversaw U.S. EPA recycle 164.37 tons of scrap metal, 970 pounds of scrap copper, and 6 pallets of electronic waste
- Oversaw the removal of all tanks, dry-cleaning and laundry machines, process equipment, and overhead piping by the ERRS contractor
- Oversaw the cleaning of the entire Site building by the ERRS contractor
- Provided removal details to the U.S. EPA for the preparation of four pollution reports (POLREP) (**Attachment C**)
- Prepared photographic documentation of time-critical removal action activities (**Attachment D**)

Site activities were conducted by WESTON START members John Sherrard and David Sena. The four POLREPs in **Attachment C** summarize the time-critical removal action activities. The final POLREP was finalized by U.S. EPA; posted on the <http://epaossc.org/> website; and distributed to federal, state, and local representatives on August 22, 2011.

This letter report serves as the final deliverable for this TDD. WESTON START anticipates no further activities under this TDD. If you have any questions or comments regarding this report or require additional copies, please contact me at (513) 703-3092.

Sincerely,
WESTON SOLUTIONS, INC.

A handwritten signature in blue ink that reads "John Sherrard".

John Sherrard
WESTON START Project Manager



Mr. Steven Renninger
U.S. EPA, Region V

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Multi-Service Site
September 18, 2012

Attachments:

- A – Table
- B – Figure
- C – POLREPs
- D – Photographic Documentation

cc: WESTON START DCN File

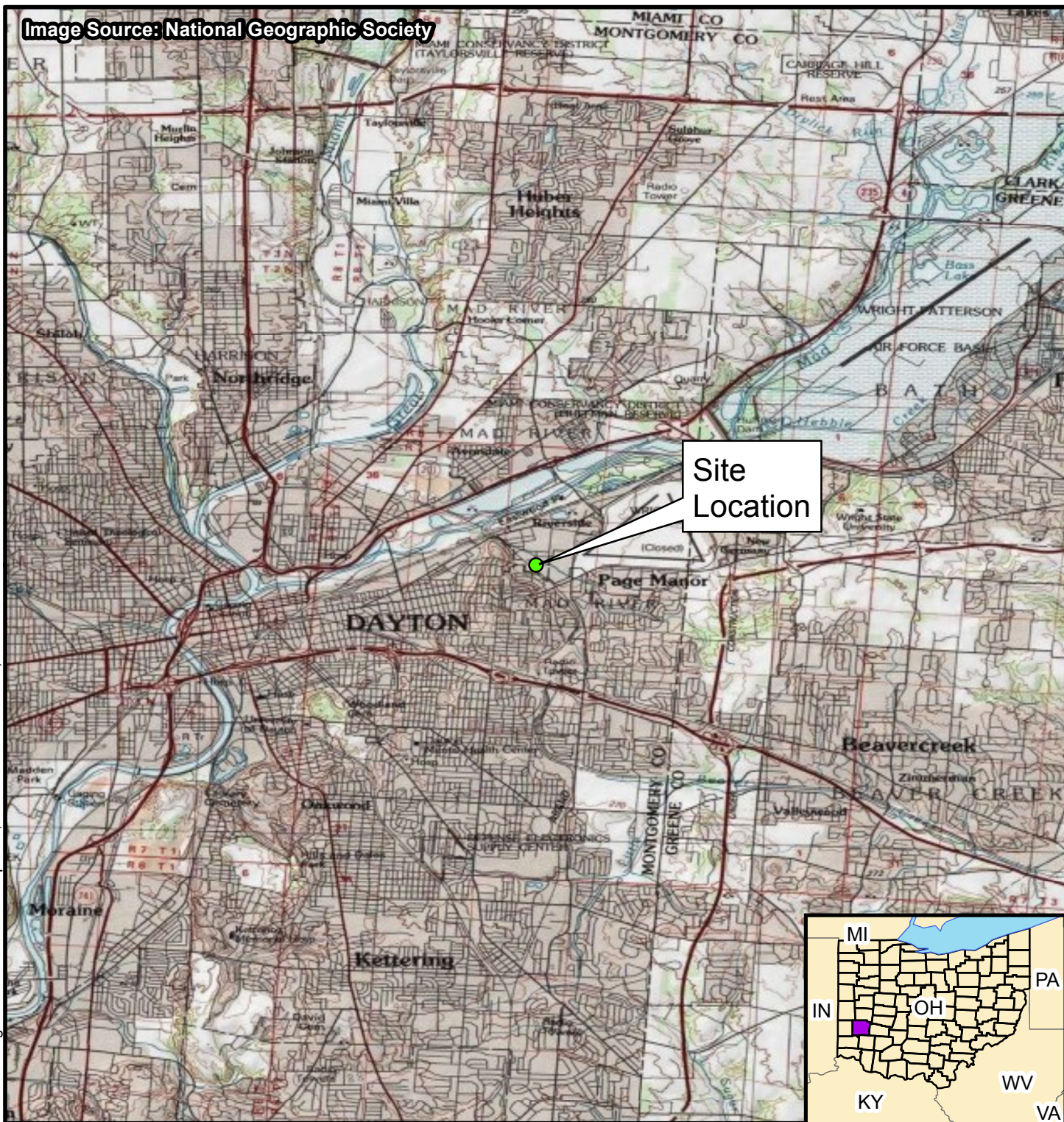
ATTACHMENT A
TABLE

TABLE 1
WASTE DISPOSAL SUMMARY TABLE
MULTI-SERVICE SITE
DAYTON, MONTGOMERY COUNTY, OHIO

Waste Stream	Medium	Quantity	Treatment	Disposal Facility
Flammable liquid	Liquid	14,925 gallons	Fuels Blending	Petro-Chem Detroit, Michigan
Flammable solvent-soaked rags and shop towels	Solid	3 rolloff boxes	Incineration	PSC (Ross Incinerator) Detroit, Michigan
Decontamination liquid (toxic)	Liquid	4,227 gallons	Treatment	Petro-Chem Detroit, Michigan
Flammable sludge (solidified)	Solid	13 rolloff boxes	Hazardous Landfill	Environmental Quality Belleville, Michigan
Non-hazardous debris	Solid	15 rolloff boxes	Landfill	Waste Management Stony Hollow Landfill Dayton, Ohio
Scrap metal	Solid	164.37 tons	Recycle	Franklin Iron & Scrap Dayton, Ohio
Scrap copper	Solid	970 pounds	Recycle	Franklin Iron & Scrap Dayton, Ohio
Electronic waste (old electronics)	Solid	6 pallets	Recycle	Ohio Drop Off Columbus, Ohio

ATTACHMENT B
FIGURE

Image Source: National Geographic Society



0 1 Miles



Prepared For:
U.S. EPA REGION V

Contract No: EP-S5-06-04
TDD No.: S05-0001-1102-017
DCN: 1386-2A-BAPA



Prepared By:
WESTON SOLUTIONS, INC.

4710-A Interstate Drive
Cincinnati, Ohio 45246

Figure 1
Site Location Map
Multi-Service Site
Dayton, Montgomery County, Ohio

ATTACHMENT C
POLREPs

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Multi-Service Site - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V**

Subject: **POLREP #1**
 Initial
 Multi-Service Site
 C508
 Dayton, OH
 Latitude: 39.7717600 Longitude: -84.1294400

To: David Chung, U.S. EPA
 Jason El-Zein, U.S. EPA
 Linda Nachowicz, U.S. EPA
 Reginald Pallesen, U.S. EPA
 Michael Chezik, DOI
 Carol Ropski, U.S. EPA
 John Maritote, U.S. EPA
 Mark Durno, U.S. EPA
 Rick Karl, U.S. EPA
 Cathy Altman, Ohio EPA
 George Stroebel, Ohio EPA
 Kevin Clouse, Ohio EPA
 Dave Combs, Ohio EPA
 Dale Farmer, Ohio EPA
 Jim Crawford, Ohio EPA
 Jim Mehl, Ohio EPA - DERR
 Randy Watterworth, Ohio EPA
 Carson CocKayne, Dayton Fire Department
 Denny Bristow, Dayton Regional Hazmat
 Mark Case, Montgomery County Health Department
 Distribution List, National Response Center
 Sally Jansen, ESS

From: Steven Renninger, On-Scene Coordinator

Date: 5/10/2011

Reporting Period: April 25 through May 6, 2011

1. Introduction

1.1 Background

Site Number: C508 **Contract Number:** EP-S5-08-02

D.O. Number:	30281.0076	Action Memo Date:	2/25/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/25/2011	Start Date:	4/25/2011
Demob Date:		Completion Date:	
CERCLIS ID:	OHN000510544	RCRIS ID:	
ERNS No.:		State Notification:	Ohio EPA
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Multi-Service (MS) Site contains a 27,589-square-foot building that formerly housed an industrial laundry and dry cleaning facility. The MS Site is bordered to the north and east by the Five Rivers Metro Parks bike path and a parking lot; to the south by a wooded property; and to the west by an open lot used by a tree service company for wood storage. Commercial businesses are located within 500 feet of the Site, and the closest residences are located 300 feet south and 400 feet north of the Site. The MS Site is also located approximately 1 mile southeast of the Mad River.

1.1.2.1 Location

The MS Site is located at 1962 Radio Road in Dayton, Montgomery County, Ohio 45431. The geographical coordinates for the Site are 39° 46' 18.336" North latitude and 84° 7' 45.984 West longitude.

1.1.2.2 Description of Threat

The MS facility operated at the Site from the mid-1990s to March 2010 and laundered industrial work gloves, rags, ink towels and shop towels. The dry cleaning process used a perchloroethylene (PCE)-based solvent known as "360 Solvent" with a flashpoint of 105 degrees Fahrenheit (°F).

In 2002, the MS facility had ongoing discharge violations to the City of Dayton's sanitary sewer.

In 2003, 2004, and 2005, the Southern Ohio Environmental Crimes Task Force (Task Force) covertly sampled the MS facility's discharge and determined that the MS facility was discharging flammable liquids to the sewer. The Task Force also uncovered additional hazardous waste violations during its investigation.

As a result of the Task Force investigations, in August 2006, the owner of the MS facility, pled guilty to felony and misdemeanor charges related to the discharge into the sewer and transportation of hazardous waste. The MS facility was fined \$20,000 and placed on 2-year probation. The owner was sentenced to 2 years probation, the first 6 months of which consisted of in-home confinement; fined \$5,000; and ordered to serve 100 hours of community service.

Based on the Ohio Environmental Protection Agency's (Ohio EPA) Division of Surface Water concerns regarding waste management at the Site, in May 2009, the Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted a compliance assistance inspection at the Site. At that time, the MS facility was not exceeding the 90-day storage limit for hazardous wastes stored in tanks and totes. Subsequent hazardous waste inspections were conducted on June 4 and 15, 2009. Based on these inspections, it was determined that the MS facility was exceeding the 90-day storage

limit for hazardous waste.

Additional inspections revealed that the MS facility also was exceeding the 90-day storage limit for hazardous waste stored in a 6,300-gallon tank located outside of the building. The outdoor Hazardous Waste Storage Tank did not have proper secondary containment. Access to the tank was limited by the design of the containment wall. The tank had not been cleaned out since 2008.

Throughout 2009 and 2010, the MS facility continued to violate the 90-day storage limit for hazardous waste. The Ohio EPA DHWM referred the MS facility for enforcement in October 2009. The Ohio EPA Director's Draft Findings and Orders were sent to the MS facility in February 2010.

During inspections at the Site on January 12 and 21, 2010, the Ohio EPA DHWM observed a leaking hazardous waste drum that had been documented during earlier inspections. The leak from the drum was corrected during an inspection on January 27, 2010. During Site inspections on April 7 and 21 and May 5, 2010, another leaking drum was observed, but no corrective actions were taken until the drum was shipped off site on May 28, 2010.

Crown Solutions (Crown) operated the MS facility's wastewater treatment unit. Crown met with the site owner on March 5, 2010. During the meeting, the owner informed Crown that MS was filing for bankruptcy. Crown subsequently contacted the Ohio EPA to explain that Crown no longer operated the wastewater treatment unit at the MS facility and was discontinuing its business with MS. According to Crown, MS attempted to operate the wastewater treatment unit on its own the previous week and had caused a pipe to break, releasing waste onto the floor around the equalization tanks. This situation prompted Crown to remove equipment from the wastewater treatment unit to prevent the unit from being operated on March 9, 2010. The City of Dayton rescinded MS's discharge permit on March 15, 2010.

Due to inaction by the MS facility and rumors of bankruptcy, the Ohio EPA referred the MS facility to the Attorney General's Office for enforcement. On April 16, 2010, the Attorney General's Office met with MS in an attempt to obtain compliance. During the meeting, the site owner provided financial information detailing the expenses owed by MS.

On April 20, 2010, MS hired Mike's Sanitation to pump out waste from the wastewater treatment unit and associated tanks. On April 22, 2010, the Ohio EPA sampled wastes from the two equalization tanks (#1 and #2), the Chemical Mixing Tank, the Wastewater Treatment Pit, and the wastewater treatment unit. Samples from Equalization Tank #2, the Chemical Mixing Tank, and the Wastewater Treatment Pit had flashpoints of 137, 132, and 131 °F, respectively, indicating that the tank contents were ignitable hazardous wastes. In addition, a liquid sample from the Chemical Mixing Tank had a Toxicity Characteristic Leaching Procedure (TCLP) PCE concentration of 30 milligrams per liter (mg/L), which exceeds the TCLP PCE regulatory limit of 0.7 mg/L, thus indicating that the tank contained a toxic waste.

On May 26, 27, and 28, 2010, Clean Harbors transported 49 totes and 22 drums off site for disposal. Ohio EPA records indicate that no additional wastes have been transported off the site since the May 2010 shipment.

In April 2010, JP Morgan Chase initiated foreclosure against MS but to date has not finalized the foreclosure action. In August 2010, the site owner filed for personal bankruptcy.

On November 23, 2010, the Ohio EPA accompanied the Dayton Fire Department (DFD) on an inspection of the MS facility. The DFD was concerned about the storage of flammable materials and a non-operational fire suppression system at the Site.

On November 24, 2010, the DFD issued a Notice of Violation to Mr. Tatman and the MS facility, ordering the removal of all flammable and combustible materials from the Site.

On December 14, 2010, the DFD met with Site owner at the Site to conduct an inspection and verify that the fire suppression system was properly shut down. The DFD gave the Site owner 90 days to develop an action plan for the removal of flammable and combustible materials from the Site. During the inspection, the DFD observed liquid leaking from a solvent tank in the Tank Room.

In a letter dated January 7, 2011, the DFD formally requested assistance from the U.S. EPA to determine if the Site met the criteria for a time-critical removal action.

In a letter dated January 24, 2011, the Ohio EPA formally requested assistance from the U.S. EPA to determine if the MS Site met the criteria for a time-critical removal action. According to the Ohio EPA, since cessation of operations at the Site in March 2010, all on-site tanks are now considered waste tanks. Also according to the Ohio EPA, tanks associated with the solvent recovery process located in the Tank Room contained dirty solvent presumed to be ignitable. One of these tanks leaked waste solvent to a depth of approximately 2 inches in the Tank Room. In addition, three tanks associated with the wastewater treatment unit contained ignitable wastes.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On January 27, 2011, U.S. EPA conducted a site assessment at the MS Site and observed and documented the presence of eight tanks; a pit; a sump; and approximately 50 drums, totes, and small containers (5 gallons or less). U.S. EPA collected 10 liquid, 1 sludge and liquid, and 2 solid waste samples from tanks, drums, totes, pits, containers and a trench at the Site. Based on analytical results for samples collected during the site assessment, the tanks, drums, totes, and containers contain flammable liquids, caustic liquids, corrosive solids, and toxic liquid wastes.

Hazardous wastes identified at the Site exhibit the following characteristics:

- Ignitability
- Corrosivity
- Toxicity (TCLP PCE [D039])

Based on the analytical results and Site conditions observed during the site assessment, the Site met the criteria for a removal action pursuant to 40 CFR 300.415(b)(2).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On February 25, 2011, the U.S. EPA Action Memorandum was signed by the Director of the U.S. EPA Region V Superfund Division approving funding for a time-critical removal action at the MS Site.

On March 9, 2011, the Emergency Contingency Plan was finalized by U.S. EPA and distributed to the DFD.

On April 7, 2011, a delivery order was issued to the ERRS contractor (EQM) to conduct time-critical removal activities at the Site.

2.1.2 Response Actions to Date

Week of April 25, 2011

During the week of April 25, 2011, ERRS mobilized three office trailers, roll-off boxes, equipment and set up the command post at the site. An electrician was hired to hard-wire the office trailers to the on-site building.

On April 27, 2011, the health and safety plan (HASP) was finalized.

Week of May 2, 2011

On May 3, 2011, U.S. EPA, START and ERRS personnel mobilized to the Site. The HASP was reviewed and signed by all personnel.

ERRS set up the decontamination area and START organized the hazard categorization trailer. ERRS initiated removal activities by staging all drums and containers near the bay doors prior to sampling. ERRS began sampling on May 3rd and completed sampling all tanks, pits, drums and containers on May 5th. A total of 109 samples were collected.

ERRS used sawzaws to cut apart empty poly 55-gallon drums. The poly drum pieces and non-hazardous debris from inside the facility was placed into a non-hazardous rolloff box. ERRS also loaded rolloff boxes with scrap metal from the facility.

On May 4, 2011, one rolloff box containing 2.02 tons of scrap metal was transported to Franklin Iron & Scrap, located in Dayton, Ohio for recycling.

On May 5, 2011, START collected two 8-hour SUMMA canister indoor air samples from within the building. The indoor air samples will be analyzed for VOCs using EPA Method TO-15. The results will verify the level of respirator protection to be used inside the building during the removal action.

On May 5, 2011, one rolloff box containing non-hazardous debris was transported for off-site disposal to Stony Hollow Landfill, located in Dayton, Ohio. In addition, one rolloff box

containing 1.98 tons of scrap metal was transported to Franklin Iron & Scrap, located in Dayton, Ohio for recycling.

All personnel were temporarily demobilized from the Site on May 6, 2011 pending haz-cattng and wastestream analysis. Off-hours site security was established from May 3rd through May 22nd.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fund the removal action.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non-hazardous debris	Solid	1 rolloff box	Not applicable	Landfill	Waste Management - Stony Hollow Landfill Dayton, OH
Scrap metal	Solid	2 rolloff boxes (4 tons)	Not applicable	Recycling	Franklin Iron & Scrap Dayton, OH

2.2 Planning Section

2.2.1 Anticipated Activities

The U.S. EPA will conduct the following activities:

1. Develop and implement a Site-specific HASP, including an Air Monitoring Plan, a Site Emergency Contingency Plan and a Site Security Plan;
2. Inventory and perform hazard characterization on all substances contained in tanks, totes, drums, containers and tanks;
3. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
4. Dismantle, decontaminate and remove process equipment, tanks and building components associated with the product process area, as necessary;
5. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CF.R. § 300.440); and

2.2.1.1 Planned Response Activities

See Section 2.2.1.2.

2.2.1.2 Next Steps

1. Hazard categorize all samples (May 9-May 20).
2. Enter all hazard categorization data into U.S. EPA's ERT DrumTrak database program.
3. Identify waste streams (May 9-May 20).
4. Conduct bench-scale tests of waste streams.
5. Composite and submit waste disposal samples for laboratory analysis (May 9-May 20)
6. Generate Waste Profiles.
7. Bulk wastestreams in preparation for off-site disposal (May-July).
8. Conduct off-site disposal of waste on site (May-July).
9. Conduct air monitoring during removal activities (May-July).
10. Continue off-shift security once ERRS remobilizes back to the Site.

2.2.2 Issues

1. Re-mobilize to the Site on May 22, 2011.
2. When U.S. EPA is on Site, the Site hours will be from 0700 to 1830 hours on Monday through Friday.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

U.S. EPA is funding the removal action.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$100,000.00	\$71,950.00	\$28,050.00	28.05%
TAT/START	\$20,000.00	\$2,452.00	\$17,548.00	87.74%
Intramural Costs				
USEPA - Direct	\$20,000.00	\$2,800.00	\$17,200.00	86.00%
Total Site Costs	\$140,000.00	\$77,202.00	\$62,798.00	44.86%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

The HASP was finalized on April 27, 2011.

The HASP was reviewed and signed by Site personnel on May 3, 2011.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

Dayton Fire Department - Carson CocKayne

Ohio EPA - Cathy Altman

4. Personnel On Site

U.S. EPA -- 1 OSC

START -- 1 WESTON START

ERRS -- 4 EQM and 3 Inland Waters of Ohio

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information such as a copy of "U.S. EPA's Site Assessment Report" or the "Emergency Contingency Plan", please refer to the "Documents" Section of the project website <http://www.epaosc.org/>.

6.2 Reporting Schedule

The next POLREP will be issued in June 2011.

7. Situational Reference Materials

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Multi-Service Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #2
POLREP #2
Multi-Service Site
C508
Dayton, OH
Latitude: 39.7717600 Longitude: -84.1294400

To: Sherry Fielding, U.S. EPA
Jason El-Zein, U.S. EPA
Linda Nachowicz, U.S. EPA
Reginald Pallesen, U.S. EPA
Michael Chezik, DOI
Carol Ropski, U.S. EPA
John Maritote, U.S. EPA
Mark Durno, U.S. EPA
Rick Karl, U.S. EPA
Tracy Johnson, U.S. EPA
Victor Dvorak, U.S. EPA
Cathy Altman, Ohio EPA
George Stroebe, Ohio EPA
Kevin Clouse, Ohio EPA
Scott Shane, Ohio EPA
Dave Combs, Ohio EPA
Dale Farmer, Ohio EPA
Jim Crawford, Ohio EPA
Jim Mehl, Ohio EPA - DERR
Randy Watterworth, Ohio EPA
Carson Cockayne, Dayton Fire Department
Denny Bristow, Dayton Regional Hazmat
Mark Case, Montgomery County Health Department
Distribution List, National Response Center
Sally Jansen, ESS

From: Steven Renninger, On-Scene Coordinator

Date: 6/3/2011

Reporting Period: May 7 through June 3, 2011

1. Introduction

1.1 Background

Site Number:	C508	Contract Number:	EP-S5-08-02
D.O. Number:	30281.0076	Action Memo Date:	2/25/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/25/2011	Start Date:	4/25/2011
Demob Date:		Completion Date:	
CERCLIS ID:	OHN000510544	RCRIS ID:	
ERNS No.:		State Notification:	Ohio EPA
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Multi-Service (MS) Site contains a 27,589-square-foot building that formerly housed an industrial laundry and dry cleaning facility. The MS Site is bordered to the north and east by the Five Rivers Metro Parks bike path and a parking lot; to the south by a wooded property; and to the west by an open lot used by a tree service company for wood storage. Commercial businesses are located within 500 feet of the Site, and the closest residences are located 300 feet south and 400 feet north of the Site. The MS Site is also located approximately 1 mile southeast of the Mad River.

1.1.2.1 Location

The MS Site is located at 1962 Radio Road in Dayton, Montgomery County, Ohio 45431. The geographical coordinates for the Site are 39° 46' 18.336" North latitude and 84° 7' 45.984 West longitude.

1.1.2.2 Description of Threat

The MS facility operated at the Site from the mid-1990s to March 2010 and laundered industrial work gloves, rags, ink towels and shop towels. The dry cleaning process used a perchloroethylene (PCE)-based solvent known as "360 Solvent" with a flashpoint of 105 degrees Fahrenheit (°F).

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management at the Site, in May 2009, the Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted a compliance assistance inspection at the Site. At that time, the MS facility was not exceeding the 90-day storage limit for hazardous wastes stored in tanks and totes. Subsequent hazardous waste inspections were conducted on June 4 and 15, 2009. Based on these inspections, it was determined that the MS facility was exceeding the 90-day storage limit for hazardous waste.

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On December 14, 2010, the DFD met with Site owner at the Site to conduct an inspection and verify that the fire suppression system was properly shut down. The DFD gave the Site owner 90 days to develop an action plan for the removal of flammable and combustible materials from the Site. During the inspection, the DFD observed liquid leaking from a solvent tank in the Tank Room.

In a letter dated January 7, 2011, the DFD formally requested assistance from the U.S. EPA to determine if the Site met the criteria for a time-critical removal action.

In a letter dated January 24, 2011, the Ohio EPA formally requested assistance from the U.S. EPA to determine if the MS Site met the criteria for a time-critical removal action. According to the Ohio EPA, since cessation of operations at the Site in March 2010, all on-site tanks are now considered waste tanks. Also according to the Ohio EPA, tanks associated with the solvent recovery process located in the Tank Room contained dirty solvent presumed to be ignitable. One of these tanks leaked waste solvent to a depth of approximately 2 inches in the Tank Room. In addition, three tanks associated with the wastewater treatment unit contained ignitable wastes.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On January 27, 2011, U.S. EPA conducted a site assessment at the MS Site and observed and documented the presence of eight tanks; a pit; a sump; and approximately 50 drums, totes, and small containers (5 gallons or less). U.S. EPA collected 10 liquid, 1 sludge and liquid, and 2 solid waste samples from tanks, drums, totes, pits, containers and a trench at the Site. Based on analytical results for samples collected during the site assessment, the tanks, drums, totes, and containers contain flammable liquids, caustic liquids, corrosive solids, and toxic liquid wastes.

Hazardous wastes identified at the Site exhibit the following characteristics:

- Ignitability
- Corrosivity
- Toxicity (TCLP PCE [D039])

Based on the analytical results and Site conditions observed during the site assessment, the Site met the criteria for a removal action pursuant to 40 CFR 300.415(b)(2).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On February 25, 2011, the U.S. EPA Action Memorandum was signed by the Director of the U.S. EPA Region V Superfund Division approving funding for a time-critical removal action at the MS Site.

On March 9, 2011, the Emergency Contingency Plan was finalized by U.S. EPA and distributed to the DFD.

On April 7, 2011, a delivery order was issued to the ERRS contractor (EQM) to conduct time-critical removal activities at the Site.

On May 3, 2011, U.S. EPA, START and ERRS personnel mobilized to the site to begin time-critical removal activities.

During the week of May 3, 2011, all drums, tanks and containers were sampled.

2.1.2 Response Actions to Date

Week of May 9, 2011

During the week of May 9, 2011, all drum, tank and container samples were hazard categorized (haz-cat) by WESTON START. The haz-cat information was entered into U.S. EPA ERT's DrumTrak database program for organization.

Week of May 16, 2011

During the week of May 16, 2011, three disposal samples were made and subitted to a commercial laboratory for analysis. The majority waste on site includes flammable liquids, flammable solids/sludge and neutral liquid.

Week of May 23, 2011

Two 6,500-gallon baker storage tanks and a 20,000-gallon frac tank were mobilized to the site to hold the flammable and neutral liquid wastestreams.

ERRS completed bulking the neutral liquid wastestream into one of the 6,500-gallon baker storage tanks. Approximately 5,500 gallons of neutral liquid is estimated in the baker storage tank awaiting final disposal. All drums associated with the neutral liquid wastestream were either crushed with the Bobcat or cut-up with a sawzaw by ERRS for off-site disposal.

ERRS completed bulking flammable liquid from 55-gallon drums, the four tanks located in the Tank Room and from the pipes located in the Tank Room. The flammable liquid was bulked into a 6,500-gallon Baker tank which is positioned near the former dry cleaning line. U.S. EPA estimates approximately 5,000-gallons of flammable liquid is currently stored in the Baker tank awaiting disposal.

WESTON START conducted air monitoring for VOCs, carbon monoxide and lower explosive limit (LEL) using an AreaRAE network.

Two 20-cubic yard rolloff boxes containing non-hazardous debris were transported for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

Two rolloff boxes containing scrap metal (4.04 tons) were transported for recycling to Franklin Iron & Scrap, located in Dayton, OH.

Off-hours site security is being conducted.

Week of May 30, 2011

No site work was conducted on Monday, May 30, 2011 - Memorial Day.

ERRS completed bulking flammable liquid from the two Equalization Tanks and the Chemical Mixing Tank in the Wastewater Treatment Area, and from the Hazardous Waste Storage tank located on the southside of the facility into the 20,000-gallon frac tank. U.S. EPA estimates approximately 7,000 gallons of flammable liquid is bulked and currently staged in the 20,000-gallon frac tank awaiting disposal.

ERRS completed staging 10 55-gallon drums of caustic liquid/sludge, 2 55-gallon drums of acid liquid and 6 55-gallon drums of acid solids in the northeastern corner of the building (former laundry folding area).

ERRS began dismantling the piping in and around the wastewater treatment area and from within the trench adjacent to the centrifuge located adjacent to the dry cleaning machines.

ERRS began cleaning out the sludge press tank in the wastewater treatment area in Level B PPE. The sludge press tank contains flammable sludge.

ERRS continues to cut up poly drums and empty poly tanks with sawzaws. ERRS loading scrap metal into rolloff boxes for recycling.

WESTON START conducted air monitoring for VOCs, carbon monoxide and lower explosive limit (LEL) using an AreaRAE network.

One 20-cubic yard rolloff box containing non-hazardous debris was transported for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

On June 1, 2011, six pallets of electronic waste (e-waste), such as old computer monitors, copy machines, telephones, fax machines, printers, electric typewriters, laptops, etc, was picked up for free recycling by Ohio Drop Off, located in Columbus, OH.

Off-hours site security is being conducted.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fund the removal action.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non-hazardous debris	Solid	3 rolloff boxes	Not applicable	Landfill	Waste Management - Stony Hollow Landfill Dayton, OH
Scrap metal	Solid	4 rolloff boxes (8 tons)	Not applicable	Recycling	Franklin Iron & Scrap Dayton, OH
E-Waste	Solid	6 pallets	Not applicable	Recycling	Ohio Drop Off Columbus, OH

2.2 Planning Section

2.2.1 Anticipated Activities

The U.S. EPA will conduct the following activities:

1. Develop and implement a Site-specific HASP, including an Air Monitoring Plan, a Site Emergency Contingency Plan and a Site Security Plan;
2. Inventory and perform hazard characterization on all substances contained in tanks, totes, drums, containers and tanks;
3. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
4. Dismantle, decontaminate and remove process equipment, tanks and building components associated with the product process area, as necessary;
5. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CF.R. § 300.440); and

2.2.1.1 Planned Response Activities

See Section 2.2.1.2.

2.2.1.2 Next Steps

1. Complete Waste Profiles.
2. Bulk flammable solid/sludge wastestream
3. Bulk acid liquid, acid solid and caustic liquid/sludge wastestreams.
4. Schedule disposal of flammable liquid and neutral liquid wastestreams.
5. Conduct off-site disposal of waste streams.
6. Conduct air monitoring during removal activities.
7. Continue off-shift security.

2.2.2 Issues

1. There will be no Site work the week of June 6th or the week of June 20th. Site security will be on Site during the weeks U.S. EPA will not be working on Site.
2. When U.S. EPA is on Site, the Site hours will be from 0700 to 1830 hours on Monday through Friday.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

U.S. EPA is funding the removal action.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$300,000.00	\$92,045.00	\$207,955.00	69.32%
TAT/START	\$25,000.00	\$11,000.00	\$14,000.00	56.00%
Intramural Costs				
USEPA - Direct	\$25,000.00	\$9,000.00	\$16,000.00	64.00%
Total Site Costs	\$350,000.00	\$112,045.00	\$237,955.00	67.99%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

The HASP was finalized on April 27, 2011.

The HASP was reviewed and signed by Site personnel on May 3, 2011.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

Dayton Fire Department - Carson CocKayne

Ohio EPA - Cathy Altman

4. Personnel On Site

U.S. EPA -- 1 OSC

START -- 1 WESTON START

ERRS -- 3 EQM and 3 Inland Waters of Ohio

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information such as a copy of "U.S. EPA's Site Assessment Report" or the "Emergency

Contingency Plan", please refer to the "Documents" Section of the project website

<http://www.epaosc.org/>.

6.2 Reporting Schedule

The next POLREP will be issued in July 2011.

7. Situational Reference Materials

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Multi-Service Site - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V**

Subject: **POLREP #3**
Progress
Multi-Service Site
C508
Dayton, OH
Latitude: 39.7717600 Longitude: -84.1294400

To: Sherry Fielding, U.S. EPA
Jason El-Zein, U.S. EPA
Linda Nachowicz, U.S. EPA
Reginald Pallesen, U.S. EPA
Michael Chezik, DOI
Carol Ropski, U.S. EPA
John Maritote, U.S. EPA
Mark Durno, U.S. EPA
Rick Karl, U.S. EPA
Tracy Johnson, U.S. EPA
Victor Dvorak, U.S. EPA
Cathy Altman, Ohio EPA
George Stroebel, Ohio EPA
Kevin Clouse, Ohio EPA
Scott Shane, Ohio EPA
Dave Combs, Ohio EPA
Dale Farmer, Ohio EPA
Jim Crawford, Ohio EPA
Jim Mehl, Ohio EPA - DERR
Randy Watterworth, Ohio EPA
Carson Cockayne, Dayton Fire Department
Denny Bristow, Dayton Regional Hazmat
Mark Case, Montgomery County Health Department
Distribution List, National Response Center
Sally Jansen, ESS

From: Steven Renninger, On-Scene Coordinator
Date: 7/21/2011
Reporting Period: June 4 through July 22, 2011

1. Introduction

1.1 Background

Site Number: C508 **Contract Number:** EP-S5-08-02

D.O. Number:	30281.0076	Action Memo Date:	2/25/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/25/2011	Start Date:	4/25/2011
Demob Date:		Completion Date:	
CERCLIS ID:	OHN000510544	RCRIS ID:	
ERNS No.:		State Notification:	Ohio EPA
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Multi-Service (MS) Site contains a 27,589-square-foot building that formerly housed an industrial laundry and dry cleaning facility. The MS Site is bordered to the north and east by the Five Rivers Metro Parks bike path and a parking lot; to the south by a wooded property; and to the west by an open lot used by a tree service company for wood storage. Commercial businesses are located within 500 feet of the Site, and the closest residences are located 300 feet south and 400 feet north of the Site. The MS Site is also located approximately 1 mile southeast of the Mad River.

1.1.2.1 Location

The MS Site is located at 1962 Radio Road in Dayton, Montgomery County, Ohio 45431. The geographical coordinates for the Site are 39° 46' 18.336" North latitude and 84° 7' 45.984 West longitude.

1.1.2.2 Description of Threat

The MS facility operated at the Site from the mid-1990s to March 2010 and laundered industrial work gloves, rags, ink towels and shop towels. The dry cleaning process used a perchloroethylene (PCE)-based solvent known as "360 Solvent" with a flashpoint of 105 degrees Fahrenheit (°F).

In 2002, the MS facility had ongoing discharge violations to the City of Dayton's sanitary sewer.

In 2003, 2004, and 2005, the Southern Ohio Environmental Crimes Task Force (Task Force) covertly

sampled the MS facility's discharge and determined that the MS facility was discharging flammable liquids to the sewer. The Task Force also uncovered additional hazardous waste violations during its investigation.

As a result of the Task Force investigations, in August 2006, the owner of the MS facility, pled guilty to felony and misdemeanor charges related to the discharge into the sewer and transportation of hazardous waste. The MS facility was fined \$20,000 and placed on 2-year probation. The owner was sentenced to 2 years probation, the first 6 months of which consisted of in-home confinement; fined \$5,000; and ordered to serve 100 hours of community service.

Based on the Ohio Environmental Protection Agency's (Ohio EPA) Division of Surface Water concerns regarding waste management at the Site, in May 2009, the Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted a compliance assistance inspection at the Site. At that time, the MS facility was not exceeding the 90-day storage limit for hazardous wastes stored in tanks and totes. Subsequent hazardous waste inspections were conducted on June 4 and 15, 2009. Based on these inspections, it was determined that the MS facility was exceeding the 90-day storage limit for hazardous waste.

Additional inspections revealed that the MS facility also was exceeding the 90-day storage limit for hazardous waste stored in a 6,300-gallon tank located outside of the building. The outdoor Hazardous Waste Storage Tank did not have proper secondary containment. Access to the tank was limited by the design of the containment wall. The tank had not been cleaned out since 2008.

Throughout 2009 and 2010, the MS facility continued to violate the 90-day storage limit for hazardous waste. The Ohio EPA DHWM referred the MS facility for enforcement in October 2009. The Ohio EPA Director's Draft Findings and Orders were sent to the MS facility in February 2010.

During inspections at the Site on January 12 and 21, 2010, the Ohio EPA DHWM observed a leaking hazardous waste drum that had been documented during earlier inspections. The leak from the drum was corrected during an inspection on January 27, 2010. During Site inspections on April 7 and 21 and May 5, 2010, another leaking drum was observed, but no corrective actions were taken until the drum was shipped off site on May 28, 2010.

Crown Solutions (Crown) operated the MS facility's wastewater treatment unit. Crown met with the site owner on March 5, 2010. During the meeting, the owner informed Crown that MS was filing for bankruptcy. Crown subsequently contacted the Ohio EPA to explain that Crown no longer operated the wastewater treatment unit at the MS facility and was discontinuing its business with MS. According to Crown, MS attempted to operate the wastewater treatment unit on its own the previous week and had caused a pipe to break, releasing waste onto the floor around the equalization tanks. This situation

prompted Crown to remove equipment from the wastewater treatment unit to prevent the unit from being operated on March 9, 2010. The City of Dayton rescinded MS's discharge permit on March 15, 2010.

Due to inaction by the MS facility and rumors of bankruptcy, the Ohio EPA referred the MS facility to the Attorney General's Office for enforcement. On April 16, 2010, the Attorney General's Office met with MS in an attempt to obtain compliance. During the meeting, the site owner provided financial information detailing the expenses owed by MS.

On April 20, 2010, MS hired Mike's Sanitation to pump out waste from the wastewater treatment unit and associated tanks. On April 22, 2010, the Ohio EPA sampled wastes from the two equalization tanks (#1 and #2), the Chemical Mixing Tank, the Wastewater Treatment Pit, and the wastewater treatment unit. Samples from Equalization Tank #2, the Chemical Mixing Tank, and the Wastewater Treatment Pit had flashpoints of 137, 132, and 131 °F, respectively, indicating that the tank contents were ignitable hazardous wastes. In addition, a liquid sample from the Chemical Mixing Tank had a Toxicity Characteristic Leaching Procedure (TCLP) PCE concentration of 30 milligrams per liter (mg/L), which exceeds the TCLP PCE regulatory limit of 0.7 mg/L, thus indicating that the tank contained a toxic waste.

On May 26, 27, and 28, 2010, Clean Harbors transported 49 totes and 22 drums off site for disposal. Ohio EPA records indicate that no additional wastes have been transported off the site since the May 2010 shipment.

In April 2010, JP Morgan Chase initiated foreclosure against MS but to date has not finalized the foreclosure action. In August 2010, the site owner filed for personal bankruptcy.

On November 23, 2010, the Ohio EPA accompanied the Dayton Fire Department (DFD) on an inspection of the MS facility. The DFD was concerned about the storage of flammable materials and a non-operational fire suppression system at the Site.

On November 24, 2010, the DFD issued a Notice of Violation to the Site owner and the MS facility, ordering the removal of all flammable and combustible materials from the Site.

On December 14, 2010, the DFD met with Site owner at the Site to conduct an inspection and verify that the fire suppression system was properly shut down. The DFD gave the Site owner 90 days to develop an action plan for the removal of flammable and combustible materials from the Site. During the inspection, the DFD observed liquid leaking from a solvent tank in the Tank Room.

In a letter dated January 7, 2011, the DFD formally requested assistance from the U.S. EPA to determine if the Site met the criteria for a time-critical removal action.

In a letter dated January 24, 2011, the Ohio EPA formally requested assistance from the U.S. EPA to determine if the MS Site met the criteria for a time-critical removal action. According to the Ohio EPA, since cessation of operations at the Site in March 2010, all on-site tanks are now considered waste tanks. Also according to the Ohio EPA, tanks associated with the solvent recovery process located in the Tank Room contained dirty solvent presumed to be ignitable. One of these tanks leaked waste solvent to a depth of approximately 2 inches in the Tank Room. In addition, three tanks associated with the wastewater treatment unit contained ignitable wastes.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On January 27, 2011, U.S. EPA conducted a site assessment at the MS Site and observed and documented the presence of eight tanks; a pit; a sump; and approximately 50 drums, totes, and small containers (5 gallons or less). U.S. EPA collected 10 liquid, 1 sludge and liquid, and 2 solid waste samples from tanks, drums, totes, pits, containers and a trench at the Site. Based on analytical results for samples collected during the site assessment, the tanks, drums, totes, and containers contain flammable liquids, caustic liquids, corrosive solids, and toxic liquid wastes.

Hazardous wastes identified at the Site exhibit the following characteristics:

- Ignitability
- Corrosivity
- Toxicity (TCLP PCE [D039])

Based on the analytical results and Site conditions observed during the site assessment, the Site met the criteria for a removal action pursuant to 40 CFR 300.415(b)(2).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On February 25, 2011, the U.S. EPA Action Memorandum was signed by the Director of the U.S. EPA Region V Superfund Division approving funding for a time-critical removal action at the MS Site.

On March 9, 2011, the Emergency Contingency Plan was finalized by U.S. EPA and distributed to

the DFD.

On April 7, 2011, a delivery order was issued to the ERRS contractor (EQM) to conduct time-critical removal

activities at the Site.

On May 3, 2011, U.S. EPA, START and ERRS personnel mobilized to the site to begin time-critical removal activities.

During the week of May 3, 2011, all drums, tanks and containers were sampled.

From May 7 through June 3, 2011, all drums, tanks and containers were hazard categorized and wastestreams were profiled for disposal. ERRS began shipping for off-site disposal the flammable liquid and neutral liquid wastestreams.

2.1.2 Response Actions to Date

Week of June 6, 2011

No site work was conducted during the week of June 6th.

Electrician was on site to disconnect power to the existing dry cleaning machines and regular laundry washing and drying machines.

On June 8, one 20-cubic yard rolloff box containing non-hazardous debris was transported for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

Off-hours site security is being conducted.

Week of June 13, 2011

There are former Multi-Service box trucks on site that contain hundreds of poly drums

containing contaminated rags and shop towels that were collected from various industries for cleaning and recycling, as part of the Multi-Service business. All of the rags and shop towels are highly contaminated with solvents and are considered flammable, and must be disposed as such. ERRS began removing the drums containing flammable solvent-soaked rags and shop towels from on-site box trucks and emptied the contents into a rolloff box prior to off-site disposal.

ERRS began dismantling the dry cleaning machines and associated piping. Flammable solvent liquid was pumped out of the units and drained and collected (for disposal) from the piping systems.

ERRS completed cleaning out the sludge press located in the wastewater treatment area. ERRS continued to crush and cut up empty metal and poly drums.

EPA START conducted air monitoring for VOCs, carbon monoxide and lower explosive limit (LEL) using an AreaRAE network.

On June 14, one rolloff box containing scrap metal (2.06 tons) was transported for recycling to Franklin Iron & Scrap, located in Dayton, OH.

On June 15, two tanker trucks containing approximately 10,225 gallons of flammable liquid were transported for off-site disposal to PetroChem, Detroit, MI.

On June 16, one tanker truck containing approximately 4,700 gallons of flammable liquid was transported for off-site disposal to PetroChem, Detroit, MI.

On June 16, one rolloff box containing approximately 13 tons of solvent-soaked rags and shop towels was transported for off-site disposal to PetroChem, Detroit, MI.

Off-hours site security is being conducted.

Week of June 20, 2011

No site work was conducted during the week of June 20th.

Week of June 27, 2011

ERRS began dismantling the wastewater treatment tanks and associated piping systems.

ERRS began solidifying flammable sludge from the tanks and trenches with a bed ash granular solidification agent called Calciment. The mixing was conducted using two mini excavators to prepare waste for off-site disposal.

ERRS continued removing drums containing solvent-soaked rags and shop towels from on-site box trucks and emptied the contents into a rolloff box prior to off-site disposal.

EPA START conducted air monitoring for VOCs, chlorine, ammonia and LEL using an AreaRAE network.

On June 28, one rolloff box containing scrap metal (1.87 tons) was transported for recycling to Franklin Iron & Scrap, located in Dayton, OH.

On June 28, one 20-cubic yard rolloff box containing non-hazardous debris was transported for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

On June 30, one 20-cubic yard rolloff box containing non-hazardous debris was transported for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

On June 30, one rolloff box containing scrap metal (2.04 tons) was transported for recycling to Franklin Iron & Scrap, located in Dayton, OH.

Off-hours site security is being conducted.

Week of July 4, 2011

The site was shut down for the 4th of July holiday on July 4th and July 5th.

ERRS completed removing all drums containing solvent-soaked rags and shop towels from on-site box trucks and emptying the contents into a rolloff box prior to off-site disposal.

ERRS continued mixing solidification agent with flammable sludge from tanks, drums and trenches. ERRS continued cleaning trenches inside building.

ERRS completed removing piping and cleaning the two trenches located beneath the dry cleaning machines. The trenches contained thick flammable sludge.

ERRS began removing overhead piping and venting equipment in the regular laundry machine area.

EPA START conducted air monitoring for VOCs, chlorine, ammonia and LEL using an AreaRAE network.

On July 6, one rolloff box containing approximately 13 tons of solvent-soaked rags and shop towels was transported for off-site disposal to PetroChem, Detroit, MI.

On July 8, one rolloff box containing approximately 13 tons of solidified flammable sludge was transported for off-site disposal to EQ, Belleville, MI.

On July 9, one rolloff box containing scrap metal (3.81 tons) was transported for recycling to Franklin Iron & Scrap, located in Dayton, OH.

Off-hours site security is being conducted.

Week of July 11, 2011

ERRS continued mixing solidification agent with flammable sludge from tanks, drums and trenches. ERRS continued cleaning trenches inside building.

EPA START conducted air monitoring for VOCs, chlorine, ammonia and LEL using an AreaRAE network.

On July 11, one 20-cubic yard rolloff box containing non-hazardous debris was transported for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

On July 12, one rolloff box containing approximately 13 tons of solidified flammable sludge was transported for off-site disposal to EQ, Belleville, MI.

On July 13, one rolloff box containing approximately 13 tons of flammable solvent-soaked rags and shop towels was transported for off-site disposal to PetroChem, Detroit, MI.

On July 13, two flat beds containing scrap metal (19.8 tons), were transported for recycling to Franklin Iron & Scrap, located in Dayton, OH.

On July 14, a vacuum truck was mobilized to the site to prepare to vacuum out flammable sludge from pits inside the facility.

On July 14, five flat beds containing scrap metal (60.6 tons), such as washing machines, and dryers, were transported for recycling to Franklin Iron & Scrap, located in Dayton, OH.

Off-hours site security is being conducted.

Week of July 18, 2011

No site work conducted on Monday, July 18th.

ERRS continued mixing solidification agent with flammable sludge from tanks, drums and trenches.

ERRS conducted a confined space entry and used the vacuum truck to clean out the 5,800-gallon pit inside the building. ERRS also used the vacuum truck to clean out the outdoor 6,300-gallon tank containing flammable sludge. The tank will eventually be cut apart using a sheers and scrapped.

On July 18, one rolloff box containing approximately 13 tons of solidified flammable sludge was transported for off-site disposal to EQ, Belleville, MI.

On July 19, one rolloff box containing approximately 13 tons of solidified flammable sludge was transported for off-site disposal to EQ, Belleville, MI.

On July 19, one rolloff box containing scrap metal (14.65 tons) was transported for recycling to Franklin Iron & Scrap, located in Dayton, OH.

On July 20, one rolloff box containing approximately 13 tons of solidified flammable sludge was transported for off-site disposal to EQ, Belleville, MI.

On July 21, one rolloff box containing approximately 13 tons of solidified flammable sludge was transported for off-site disposal to EQ, Belleville, MI.

Off-hours site security is being conducted.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fund

the removal action.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Flammable Liquid	Liquid	14,925 gallons	various	Fuels Blending	PSC Detroit, MI
Flammable solvent-soaked rags and shop towels	Solid	3 rolloff boxes	various	Incineration	PSC (Ross Incinerator) Detroit, MI
Flammable Sludge (solidified)	Solid	6 rolloff boxes	various	Landfill	EQ

					Belleville, MI
Non-hazardous debris	Solid	7 rolloff boxes	Not applicable	Landfill	Waste Management - Stony Hollow Landfill Dayton, OH
Scrap metal	Solid	118.85 tons	Not applicable	Recycling	Franklin Iron & Scrap Dayton, OH
E-Waste	Solid	6 pallets	Not applicable	Recycling	Ohio Drop Off Columbus, OH

2.2 Planning Section

2.2.1 Anticipated Activities

The U.S. EPA will conduct the following activities:

1. Develop and implement a Site-specific HASP, including an Air Monitoring Plan, a Site Emergency Contingency Plan and a Site Security Plan;
2. Inventory and perform hazard characterization on all substances contained in tanks, totes, drums, containers and tanks;
3. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;

4. Dismantle, decontaminate and remove process equipment, tanks and building components associated with the product process area, as necessary;
5. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CF.R. § 300.440); and

2.2.1.1 Planned Response Activities

See Section 2.2.1.2.

2.2.1.2 Next Steps

1. Bulk acid liquid, acid solid and caustic liquid/sludge wastestreams in preparation for off-site disposal.
2. Continue solidifying flammable sludge in preparation for off-site disposal.
3. Decontaminate trenches inside building.
4. Decontaminate and remove tanks from Tank Room.
5. Mobilize equipment and cut up tanks.
7. Decontaminate facility floor.
8. Conduct off-site disposal of waste streams.
9. Conduct air monitoring during removal activities.
10. Continue off-shift security.

2.2.2 Issues

1. There will be no Site work the week of July 25th. Site security will be on Site during the weeks U.S. EPA will not be working on Site.
2. When U.S. EPA is on Site, the Site hours will be from 0700 to 1830 hours on Monday through Friday.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

U.S. EPA is funding the removal action.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$800,000.00	\$324,000.00	\$476,000.00	59.50%
TAT/START	\$60,000.00	\$28,000.00	\$32,000.00	53.33%
Intramural Costs				
USEPA - Direct	\$50,000.00	\$22,000.00	\$28,000.00	56.00%
Total Site Costs	\$910,000.00	\$374,000.00	\$536,000.00	58.90%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the

government may include in any claim for cost recovery.

2.5 Safety Officer

The HASP was finalized on April 27, 2011.

The HASP was reviewed and signed by Site personnel on May 3, 2011.

Sludge solidification activities are being conducted in Level B respiratory protection.

Due to the extreme heat, heat stress monitoring is being conducted prior to and after each entry into the facility building.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

Dayton Fire Department - Carson Cockayne

Ohio EPA - Cathy Altman

4. Personnel On Site

U.S. EPA -- 1 OSC

START -- 1 WESTON START

ERRS -- 3 EQM and 5 Inland Waters of Ohio

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information such as a copy of "U.S. EPA's Site Assessment Report" or the "Emergency

Contingency Plan", please refer to the "Documents" Section of the project website <http://www.epaosc.org/>.

6.2 Reporting Schedule

The next POLREP will be issued in August 2011.

7. Situational Reference Materials







U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Multi-Service Site - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V**

Subject: **POLREP #4
Final POLREP
Multi-Service Site
C508
Dayton, OH
Latitude: 39.7717600 Longitude: -84.1294400**

To: Sherry Fielding, U.S. EPA
Jason El-Zein, U.S. EPA
Linda Nachowicz, U.S. EPA
Reginald Pallesen, U.S. EPA
Michael Chezik, DOI
Carol Ropski, U.S. EPA
John Maritote, U.S. EPA
Mark Durno, U.S. EPA
Rick Karl, U.S. EPA
Tracy Johnson, U.S. EPA
Victor Dvorak, U.S. EPA
Cathy Altman, Ohio EPA
George Stroebe, Ohio EPA
Kevin Clouse, Ohio EPA
Scott Shane, Ohio EPA
Dave Combs, Ohio EPA
Dale Farmer, Ohio EPA
Jim Mehl, Ohio EPA - DERR
Randy Watterworth, Ohio EPA
Carson Cockayne, Dayton Fire Department
Denny Bristow, Dayton Regional Hazmat
Mark Case, Montgomery County Health Department
Distribution List, National Response Center
Sally Jansen, ESS

From: Steven Renninger, On-Scene Coordinator

Date: 8/22/2011

Reporting Period: July 23 through August 22, 2011

1. Introduction

1.1 Background

Site Number:	C508	Contract Number:	EP-S5-08-02
D.O. Number:	30281.0076	Action Memo Date:	2/25/2011

Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/25/2011	Start Date:	4/25/2011
Demob Date:	8/22/2011	Completion Date:	8/22/2011
CERCLIS ID:	OHN000510544	RCRIS ID:	
ERNS No.:		State Notification:	Ohio EPA
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Multi-Service (MS) Site contains a 27,589-square-foot building that formerly housed an industrial laundry and dry cleaning facility. The MS Site is bordered to the north and east by the Five Rivers Metro Parks bike path and a parking lot; to the south by a wooded property; and to the west by an open lot used by a tree service company for wood storage. Commercial businesses are located within 500 feet of the Site, and the closest residences are located 300 feet south and 400 feet north of the Site. The MS Site is also located approximately 1 mile southeast of the Mad River.

1.1.2.1 Location

The MS Site is located at 1962 Radio Road in Dayton, Montgomery County, Ohio 45431. The geographical coordinates for the Site are 39° 46' 18.336" North latitude and 84° 7' 45.984 West longitude.

1.1.2.2 Description of Threat

The MS facility operated at the Site from the mid-1990s to March 2010 and laundered industrial work gloves, rags, ink towels and shop towels. The dry cleaning process used a perchloroethylene (PCE)-based solvent known as "360 Solvent" with a flashpoint of 105 degrees Fahrenheit (°F).

In 2002, the MS facility had ongoing discharge violations to the City of Dayton's sanitary sewer.

In 2003, 2004, and 2005, the Southern Ohio Environmental Crimes Task Force (Task Force) covertly sampled the MS facility's discharge and determined that the MS facility was discharging flammable liquids to the sewer. The Task Force also uncovered additional hazardous waste violations during its investigation.

As a result of the Task Force investigations, in August 2006, the owner of the MS facility, pled guilty to felony and misdemeanor charges related to the discharge into the sewer and transportation of hazardous waste. The MS facility was fined \$20,000 and placed on 2-year probation. The owner was sentenced to 2 years probation, the first 6 months of which consisted of in-home confinement; fined \$5,000; and ordered to serve 100 hours of community service.

Based on the Ohio Environmental Protection Agency's (Ohio EPA) Division of Surface Water concerns regarding waste management at the Site, in May 2009, the Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted a compliance assistance inspection at the Site. At that time, the MS facility was not exceeding the 90-day storage limit for hazardous wastes stored in tanks and totes. Subsequent hazardous waste inspections were conducted on June 4 and 15, 2009. Based on these inspections, it was determined that the MS facility was exceeding the 90-day storage limit for hazardous waste.

Additional inspections revealed that the MS facility also was exceeding the 90-day storage limit for hazardous waste stored in a 6,300-gallon tank located outside of the building. The outdoor Hazardous Waste Storage Tank did not have proper secondary containment. Access to the tank was limited by the design of the containment wall. The tank had not been cleaned out since 2008.

Throughout 2009 and 2010, the MS facility continued to violate the 90-day storage limit for hazardous waste. The Ohio EPA DHWM referred the MS facility for enforcement in October 2009. The Ohio EPA Director's Draft Findings and Orders were sent to the MS facility in February 2010.

During inspections at the Site on January 12 and 21, 2010, the Ohio EPA DHWM observed a leaking hazardous waste drum that had been documented during earlier inspections. The leak from the drum was corrected during an inspection on January 27, 2010. During Site inspections on April 7 and 21 and May 5, 2010, another leaking drum was observed, but no corrective actions were taken until the drum was shipped off site on May 28, 2010.

Crown Solutions (Crown) operated the MS facility's wastewater treatment unit. Crown met with the site owner on March 5, 2010. During the meeting, the owner informed Crown that MS was filing for bankruptcy. Crown subsequently contacted the Ohio EPA to explain that Crown no longer operated the wastewater treatment unit at the MS facility and was discontinuing its business with MS. According to Crown, MS attempted to operate the wastewater treatment unit on its own the previous week and had caused a pipe to break, releasing waste onto the floor around the equalization tanks. This situation prompted Crown to remove equipment from the wastewater treatment unit to prevent the unit from being operated on March 9, 2010. The City of Dayton rescinded MS's discharge permit on March 15, 2010.

Due to inaction by the MS facility and rumors of bankruptcy, the Ohio EPA referred the MS facility to the Attorney General's Office for enforcement. On April 16, 2010, the Attorney General's Office met with MS in an attempt to obtain compliance. During the meeting, the site owner provided financial information detailing the expenses owed by MS.

On April 20, 2010, MS hired Mike's Sanitation to pump out waste from the wastewater treatment unit and associated tanks. On April 22, 2010, the Ohio EPA sampled wastes from the two equalization tanks (#1 and #2), the Chemical Mixing Tank, the Wastewater Treatment Pit, and the wastewater treatment unit. Samples from Equalization Tank #2, the Chemical Mixing Tank, and the Wastewater Treatment Pit had flashpoints of 137, 132, and 131 °F, respectively, indicating that the tank contents were ignitable hazardous wastes. In addition, a liquid sample from the Chemical Mixing Tank had a Toxicity Characteristic Leaching Procedure (TCLP) PCE concentration of 30 milligrams per liter (mg/L), which exceeds the TCLP PCE regulatory limit of 0.7 mg/L, thus indicating that the tank contained a toxic waste.

In April 2010, JP Morgan Chase initiated foreclosure against MS but to date has not finalized the foreclosure action.

On May 26, 27, and 28, 2010, Clean Harbors transported 49 totes and 22 drums off site for disposal. Ohio EPA records indicate that no additional wastes have been transported off the site since the May 2010 shipment.

In August 2010, the site owner filed for personal bankruptcy.

On November 23, 2010, the Ohio EPA accompanied the Dayton Fire Department (DFD) on an inspection of the MS facility. The DFD was concerned about the storage of flammable materials and a non-operational fire suppression system at the Site.

On November 24, 2010, the DFD issued a Notice of Violation to the Site owner and the MS facility, ordering the removal of all flammable and combustible materials from the Site.

On December 14, 2010, the DFD met with Site owner at the Site to conduct an inspection and verify that the fire suppression system was properly shut down. The DFD gave the Site owner 90 days to develop an action plan for the removal of flammable and combustible materials from the Site. During the inspection, the DFD observed liquid leaking from a solvent tank in the Tank Room.

In a letter dated January 7, 2011, the DFD formally requested assistance from the U.S. EPA to determine if the Site met the criteria for a time-critical removal action. In a letter dated January 24, 2011, the Ohio EPA formally requested assistance from the U.S. EPA to determine if the MS Site met the criteria for a time-critical removal action. According to the Ohio EPA, since cessation of operations at the Site in March 2010, all on-site tanks are now considered waste tanks. Also according to the Ohio EPA, tanks associated with the solvent recovery process located in the Tank Room contained dirty solvent presumed to be ignitable. One of these tanks leaked waste solvent to a depth of approximately 2 inches in the Tank Room. In addition, three tanks associated with the wastewater treatment unit contained ignitable wastes.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On January 27, 2011, U.S. EPA conducted a site assessment at the MS Site and observed and documented the presence of eight tanks; a pit; a sump; and approximately 50 drums, totes, and small containers (5 gallons or less). U.S. EPA collected 10 liquid, 1 sludge and liquid, and 2 solid waste samples from tanks, drums, totes, pits, containers and a trench at the Site. Based on analytical results for samples collected during the site assessment, the tanks, drums, totes, and containers contain flammable liquids, caustic liquids, corrosive solids, and toxic liquid wastes.

Hazardous wastes identified at the Site exhibit the following characteristics:

- Ignitability
- Corrosivity
- Toxicity (TCLP PCE [D039])

Based on the analytical results and Site conditions observed during the site assessment, the Site met the criteria for a removal action pursuant to 40 CFR 300.415(b)(2).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On February 25, 2011, the U.S. EPA Action Memorandum was signed by the Director of the U.S. EPA Region V Superfund Division approving funding for a time-critical removal action at the MS Site.

On March 9, 2011, the Emergency Contingency Plan was finalized by U.S. EPA and distributed to the DFD.

On April 7, 2011, a delivery order was issued to the ERRS contractor (EQM) to conduct time-critical removal

activities at the Site.

On May 3, 2011, U.S. EPA, START and ERRS personnel mobilized to the site to begin time-critical removal activities.

During the week of May 3, 2011, all drums, tanks and containers were sampled.

From May 7 through June 3, 2011, all drums, tanks and containers were hazard categorized and wastestreams were profiled for disposal. ERRS initiated off-site disposal the flammable liquid and neutral liquid wastestreams.

From June 4 through July 22, 2011, ERRS solidified flammable sludge, continued off-site disposal of waste, and continued cleaning out the facility building.

2.1.2 Response Actions to Date

Week of July 25, 2011

Three rolloff boxes containing solidified flammable sludge were transported for off-site disposal to EQ, Belleville, MI.

Off-hours site security was conducted.

Week of August 1, 2011

ERRS subcontractor, CMC, mobilized to the site with heavy equipment and a shears attachment and removed and cut apart the vertical tanks located in the Tank Room following decontamination. The "Hazardous Waste" tank located outside of the facility was decontaminated and cut apart using the shears attachment.

ERRS completed solidifying all flammable sludge with the solidification agent. ERRS initiated sweeping the facility floor with brooms and using a pressure washer to clean the floors. ERRS completed decontamination of the 5 trenches within the facility.

ERRS transported three 20-cubic yard rolloff boxes containing non-hazardous debris for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

ERRS transported four rolloff boxes containing scrap metal (19.5 tons) for recycling to Franklin Iron & Scrap, located in Dayton, OH.

ERRS transported one rolloff box containing solidified flammable sludge for off-site disposal to EQ, Belleville, MI.

Off-hours site security was conducted.

Week of August 8, 2011

ERRS completed pressure washing the floor in the Tank Room. ERRS initiated removing the process piping inside the building. ERRS removed and disposed visibly-stained wall insulation. ERRS pressure washed the floor inside the building. All decontamination water was collected and placed into a baker storage tank pending off-site disposal.

ERRS transported two 20-cubic yard rolloff boxes containing non-hazardous debris for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

ERRS transported 3 rolloff boxes containing scrap metal (14.75 tons) and one rolloff box containing scrap copper (970 pounds) for recycling to Franklin Iron & Scrap, located in Dayton, OH.

ERRS transported two rolloff boxes containing solidified flammable sludge for off-site disposal to EQ, Belleville, MI.

Off-hours site security was conducted.

Week of August 15, 2011

ERRS completed sweeping and power-washing the facility floor. ERRS completed filling in each of the five trenches with concrete. ERRS completed installing approximately 5 inches of concrete on the Tank Room flooring. ERRS completed cleaning out all debris from the building.

ERRS transported one rolloff box containing solidified flammable sludge for off-site disposal to EQ, Belleville, MI.

ERRS transported one tanker truck containing 4,227 gallons of toxic decontamination water to PetroChem, in Detroit, MI.

ERRS transported two 20-cubic yard rolloff boxes containing non-hazardous debris for off-site disposal to Waste Management's Stony Hollow Landfill, located in Dayton, OH.

ERRS transported 2 rolloff boxes containing scrap metal (6.17 tons) for recycling to Franklin Iron & Scrap, located in Dayton, OH.

Off-hours site security was conducted through the morning of August 18th.

Week of August 22, 2011

On August 22, 2011, ERRS demobilized from the site. The removal action is completed.

On August 22, 2011, U.S. EPA met with representatives from Ohio EPA and DFD at the site to conduct a final inspection of the completed removal action.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fund the removal action.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Flammable Liquid	Liquid	14,925 gallons	various	Fuels Blending	Petro-Chem Detroit, MI
Flammable solvent-soaked rags and shop towels	Solid	3 rolloff boxes	various	Incineration	PSC (Ross Incinerator) Detroit, MI
Decontamination Water (Toxic)	Liquid	4,227 gallons	008904406JJK	Treatment	Petro-Chem Detroit, MI
Flammable Sludge	Solid	13 rolloff	various	Landfill	EQ

(solidified)		boxes			Belleville, MI
Non-hazardous debris	Solid	15 rolloff boxes	Not applicable	Landfill	Waste Management - Stony Hollow Landfill Dayton, OH
Scrap metal	Solid	164.37 tons	Not applicable	Recycling	Franklin Iron & Scrap Dayton, OH
Scrap metal (copper)	Solid	970 pounds	Not applicable	Recycling	Franklin Iron & Scrap Dayton, OH
E-Waste	Solid	6 pallets	Not applicable	Recycling	Ohio Drop Off Columbus, OH

2.2 Planning Section

2.2.1 Anticipated Activities

None.

2.2.1.1 Planned Response Activities

See Section 2.2.1.2.

2.2.1.2 Next Steps

None.

The removal action is completed.

2.2.2 Issues

Green Initiative Efforts:

U.S. EPA recycled approximately 164.37 tons of scrap metal and 970 pounds of scrap copper.

In addition, U.S. EPA recycled 6 pallets of E-Waste (electronic waste, such as old printers, copiers, phones, etc) that was collected from within the facility. The E-Waste was recycled at no cost to the U.S. EPA.

2.3 Logistics Section

Not applicable.

2.4 Finance Section

2.4.1 Narrative

U.S. EPA is funding the removal action. The approximate costs below are as of 8/17/11.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$800,000.00	\$441,541.00	\$358,459.00	44.81%
TAT/START	\$60,000.00	\$41,116.00	\$18,884.00	31.47%
Intramural Costs				
USEPA - Direct	\$50,000.00	\$41,000.00	\$9,000.00	18.00%
Total Site Costs	\$910,000.00	\$523,657.00	\$386,343.00	42.46%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

The HASP was finalized on April 27, 2011.

The HASP was reviewed and signed by Site personnel on May 3, 2011.

Sludge solidification activities were conducted in Level B respiratory protection.

Due to the extreme heat, heat stress monitoring was conducted prior to and after each entry into the facility building.

2.6 Liaison Officer

Not applicable.

2.7 Information Officer

2.7.1 Public Information Officer

Not applicable.

2.7.2 Community Involvement Coordinator

Not applicable.

3. Participating Entities

3.1 Unified Command

Not applicable.

3.2 Cooperating and Assisting Agencies

Dayton Fire Department - Carson Cockayne

Ohio EPA - Cathy Altman

4. Personnel On Site

U.S. EPA -- 1 OSC

START -- 1 WESTON START

ERRS -- 3 EQM and 5 Inland Waters of Ohio

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information such as a copy of "U.S. EPA's Site Assessment Report" or the "Emergency

Contingency Plan", please refer to the "Documents" Section of the project website <http://www.epaosc.org/>.

6.2 Reporting Schedule

This is the FINAL pollution report for the site.

7. Situational Reference Materials

Not applicable.

ATTACHMENT D
PHOTOGRAPHIC DOCUMENTATION



Site: Multi-Service Site
Photograph No.: 1
Direction: South
Subject: Entrance to facility

Date: 5/3/11
Photographer: John Sherrard



Site: Multi-Service Site
Photograph No.: 2
Direction: East
Subject: Wastes inside Site building

Date: 5/3/11
Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 3

Direction: East

Subject: ERRS contractor collecting a drum sample

Date: 5/3/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 4

Direction: West

Subject: Dry-cleaning machines

Date: 5/3/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 5

Direction: East

Subject: “Clean” and “Dirty Solvent” tanks in the Tank Room

Date: 5/3/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 6

Direction: South

Subject: Regular laundry washing machines and dryers

Date: 5/3/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 7

Direction: North

Subject: ERRS contractor using a Sawzall to cut apart plastic drums

Date: 5/5/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 8

Direction: South

Subject: Two 22,000-gallon equalization tanks and a 3,000-gallon chemical mixing tank

Date: 5/23/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 9

Date: 5/23/11

Direction: East

Photographer: John Sherrard

Subject: ERRS contractor bulking neutral liquid waste stream into a storage tank



Site: Multi-Service Site

Photograph No.: 10

Date: 5/24/11

Direction: East

Photographer: John Sherrard

Subject: ERRS contractor loading nonhazardous debris into a rolloff box



Site: Multi-Service Site

Photograph No.: 11

Direction: South

Subject: Air monitoring using an AreaRAE network

Date: 5/25/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 12

Direction: South

Subject: ERRS contractor removing flammable sludge from sludge press tank

Date: 6/3/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 13

Date: 6/13/11

Direction: South

Photographer: John Sherrard

Subject: Box trucks containing drums of rags and shop towels soaked in flammable liquids



Site: Multi-Service Site

Photograph No.: 14

Date: 6/15/11

Direction: East

Photographer: John Sherrard

Subject: Pumping out bulked flammable liquids from storage tank



Site: Multi-Service Site

Photograph No.: 15

Date: 6/16/11

Direction: South

Photographer: John Sherrard

Subject: Flammable liquid-soaked rags and shop towels staged for disposal in a lined rolloff box



Site: Multi-Service Site

Photograph No.: 16

Date: 6/28/11

Direction: South

Photographer: John Sherrard

Subject: ERRS contractor cutting apart the two equalization tanks and the chemical mixing tank



Site: Multi-Service Site

Photograph No.: 17

Date: 6/28/11

Direction: East

Photographer: John Sherrard

Subject: ERRS contractor mixing flammable sludge with a bed ash granular solidification agent called "Calciment"



Site: Multi-Service Site

Photograph No.: 18

Date: 6/30/11

Direction: East

Photographer: John Sherrard

Subject: ERRS contractor mixing flammable sludge with Calciment



Site: Multi-Service Site

Photograph No.: 19

Date: 6/30/11

Direction: South

Photographer: John Sherrard

Subject: ERRS loading solidified flammable sludge into a lined rolloff box



Site: Multi-Service Site

Photograph No.: 20

Date: 7/7/11

Direction: Down

Photographer: John Sherrard

Subject: ERRS contractor cleaning out trenches beneath the dry-cleaning machines



Site: Multi-Service Site

Photograph No.: 21

Date: 7/14/11

Direction: South

Photographer: John Sherrard

Subject: ERRS contractor cleaning out trench beneath the location of the former regular laundry machines



Site: Multi-Service Site

Photograph No.: 22

Date: 7/15/11

Direction: West

Photographer: John Sherrard

Subject: ERRS contractor staging dry-cleaning machines in preparation for recycling



Site: Multi-Service Site

Photograph No.: 23

Date: 7/19/11

Direction: West

Photographer: John Sherrard

Subject: Loading of dry-cleaning machines onto a flatbed for recycling



Site: Multi-Service Site

Photograph No.: 24

Date: 7/21/11

Direction: Down

Photographer: John Sherrard

Subject: ERRS contractor cleaning out a pit



Site: Multi-Service Site

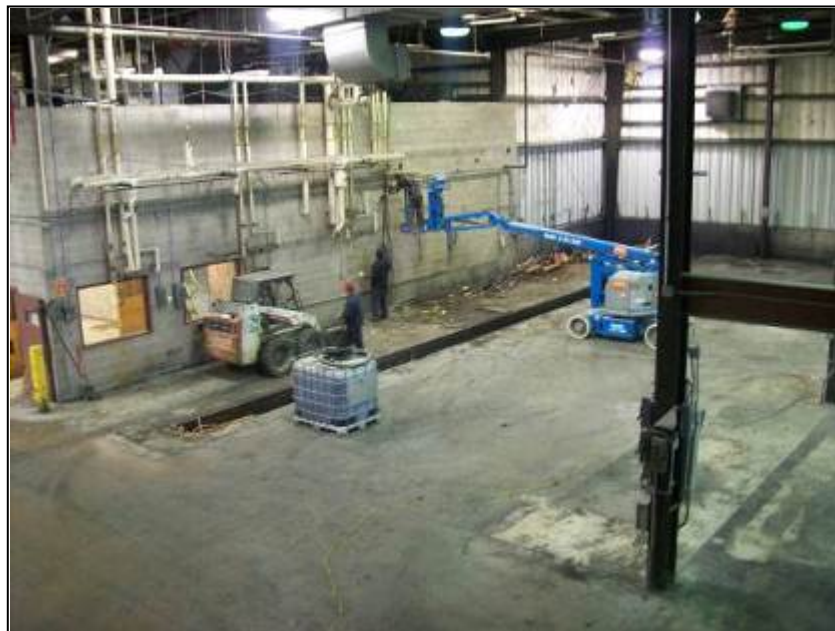
Photograph No.: 25

Date: 8/3/11

Direction: West

Photographer: John Sherrard

Subject: ERRS contractor removing tanks from the Tank Room



Site: Multi-Service Site

Photograph No.: 26

Date: 8/11/11

Direction: South

Photographer: John Sherrard

Subject: ERRS contractor using manlifts to remove overhead process piping



Site: Multi-Service Site

Photograph No.: 27

Date: 8/16/11

Direction: East

Photographer: John Sherrard

Subject: ERRS contractor pouring concrete into the Tank Room



Site: Multi-Service Site

Photograph No.: 28

Date: 8/16/11

Direction: South

Photographer: John Sherrard

Subject: ERRS contractor power-washing facility floor



Site: Multi-Service Site

Photograph No.: 29

Direction: West

Subject: Tank Room floor after concrete pouring

Date: 8/16/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 30

Direction: South

Subject: ERRS contractor pouring concrete into trenches

Date: 8/17/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 31

Direction: South

Subject: Dry-cleaning area after removal action complete

Date: 8/17/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 32

Direction: West

Subject: Inside of building after removal action complete

Date: 8/18/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 33

Direction: West

Subject: Inside of building after removal action complete

Date: 8/18/11

Photographer: John Sherrard



Site: Multi-Service Site

Photograph No.: 34

Direction: South

Subject: Inside of building after removal action complete

Date: 8/18/11

Photographer: John Sherrard